

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DEMETRIUS JOHNSON,	)	
	)	
Plaintiff,	)	
	)	Case No. 20 CV 4156
v.	)	
	)	Judge Sara L. Ellis
REYNALDO GUEVARA, JOANNE	)	
HALVORSEN as PERSONAL	)	Magistrate Judge Heather K. McShain
REPRESENTATIVE to the ESTATE of	)	
ERNEST HALVORSEN, DARRYL DALEY,	)	
WILLIAM ERICKSON, JOHN HEALY, and	)	
the CITY OF CHICAGO,	)	
	)	
Defendants.	)	

**DEFENDANT CITY OF CHICAGO’S UNOPPOSED MOTION  
FOR LEAVE TO FILE EXCESS PAGES**

Defendant, City of Chicago (the “City”), by and through its undersigned counsel, hereby moves this Honorable Court, pursuant to L.R. 7.1 and L.R. 56.1, for leave to file an oversized Reply in Further Support of Summary Judgment and oversized *Daubert* Replies, and in support thereof, states as follows:

1. Plaintiff filed a sprawling 42 page eleven-count First Amended Complaint against five (5) individual Defendants and the City of Chicago alleging various claims pursuant to 42 U.S.C. § 1983 and Illinois law arising out of his arrest, prosecution and conviction for the 1991 murder of Edwin Fred.

2. The City’s summary judgment memorandum addressed all of Plaintiff’s theories of liability for his claims. Plaintiff’s response to the City’s summary judgment totaled 44 pages. Defendant City is requesting leave to file their Reply totaling 51 pages, attached as Exhibit A.

3. The City filed two separate *Daubert* motions seeking to bar Plaintiff's experts. Plaintiff's responses to the City's Daubert motions were 40 pages for the Tiderington response, and 46 pages for the Steblay response. Defendant City is requesting leave to file their replies that will total 24 pages for Tiderington (attached as Exhibit B), and 28 pages for the Steblay response (attached as Exhibit C).

4. Additionally, the City was granted leave to file a motion to strike Plaintiff's Statement of Disputed Facts. Defendant City is requesting leave to file a motion to strike that will total 21 pages. Attached as Exhibit D.

5. This motion is not brought for purposes of harassment or undue delay.

6. Defendant City of Chicago contacted Plaintiff to determine if he opposes this request. Plaintiff has no objection.

WHEREFORE, Defendant, City of Chicago, respectfully requests that this Honorable Court enter an order granting its motions for leave to file enlarged briefs as outlined supra and for any and all other relief that this Court deems just and proper.

Dated: August 9, 2024

Respectfully Submitted,

/s/ Eileen E. Rosen  
Eileen E. Rosen  
Special Assistant Corporation Counsel  
*One of the Attorneys for City of Chicago*

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